

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CYNOSURE, LLC, a Delaware limited liability  
company; and LOTUS PARENT, INC., a Delaware  
corporation;

Plaintiffs,

v.

REVEAL LASERS LLC; a Nevada limited liability  
company, et al.

Defendants.

Civil Action No. 1:22-cv-11176-PBS

**DECLARATION OF ASHLEY N. MOORE**

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I, Ashley N. Moore, declare as follows:

1. I am a partner in the law firm of Michelman & Robinson, LLP, counsel of record for Defendants Reveal Lasers LLC, Reveal Lasers Ltd., Robert Daley, Christopher Chambers, Cory Murrell, Brogan Bair-Chambers, Joshua Smith, Michael Russo, Kyle Shapero, Jason Kalso, David Krueger, Dean Fiacco, Robert Fiacco, and Daniel Demarco in this action. I have personal knowledge of the facts herein and I can testify competently as to these facts. I offer this declaration in support of Defendants' Motion to Exclude the Expert Testimony of Bruce McFarlane.

2. In accordance with Local Rules of Court 7.1, I hereby certify that counsel for the Defendants have conferred with counsel for the Plaintiffs regarding the filing of this Motion. The parties were unable to resolve the issues raised in this Motion.

3. Attached as **Exhibit A** is a true and correct copy of the expert report of Bruce McFarlane, dated April 12, 2024.

4. Attached as **Exhibit B** is a true and correct copy of the expert report of Stephen E. Dell, dated April 26, 2024.

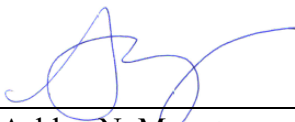
5. Attached as **Exhibit C** is a true and correct copy of Deposition Transcript Excerpts of Yunion Caballero, Robert Daley, and Robert Fiacco.

6. Attached as **Exhibit D** is a true and correct copy of a Summary of Cynosure's Terminated Employees.

7. Attached as **Exhibit E** is a true and correct copy of Deposition Excerpts of Todd Tillemans, dated November 13, 2023.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct to the best of my knowledge.

Dated: May 17, 2024

By:   
\_\_\_\_\_  
Ashley N. Moore

**CERTIFICATE OF SERVICE**

I, A. Madison Dini, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on May 17, 2024.

/s/ A. Madison Dini

A. Madison Dini